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Ms. Sharon Gillett
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554
June 5, 2012

RE: **Connect America Fund and BendBroadband Fixed Wireless Broadband Coverage in Central Oregon,
WC Docket Nos. 10-90 and 05-337**

Dear Ms. Gillett:

I understand that in a few weeks the Incumbent Local Exchange Carriers may apply for Connect America Fund Phase 1 support to upgrade their broadband facilities in accordance with the newly reformed Universal Service Fund. Under the Commission's rules, such funding is not available to Incumbent Local Exchange Carriers in areas that already have access to fixed broadband, including terrestrial fixed wireless broadband, at speeds of 768 kbps downstream and 200 kbps upstream. BendBroadband would like to apprise the FCC of its less conventional broadband project in Central Oregon which uses licensed wireless spectrum to provide fixed wireless broadband service to the less densely populated and/or rural areas of Central Oregon.

In accordance with the broadband definition in FCC documentation and Connect America program information, BendBroadband meets all requirements that determine if these areas are indeed served, including broadband speeds of at least 4 Mbps downstream and 1 Mbps upstream, with latency suitable for real-time applications and services such as primarily line phone service using VoIP, and with monthly usage capacity reasonably comparable to that of residential terrestrial fixed broadband offerings in urban areas.

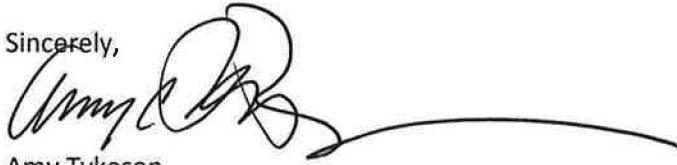
BendBroadband has deployed a 4G, LTE licensed **fixed wireless** broadband service over AWS and 700 MHz spectrum with download speeds between 4Mbps and 12Mbps with upload speeds between 1 Mbps and 3Mbps. In addition, customers may choose to purchase VOIP phone service using the same network. Service parameters and usage capacity are comparable to fixed offerings in urban areas. Based on the definitional information from the FCC, the Central Oregon areas covered by our wireless broadband network would not be eligible for Connect America Fund Phase I support by other providers.

Attached is a map which illustrates BendBroadband's 4G licensed wireless coverage area and a detailed list of the corresponding 2010 census tract data for this served area.

With limited taxpayer resources, considerable private sector risk capital already invested and significant merger/acquisition stipulations imposed by the FCC on CenturyLink, I appreciate the added review of USF and Connect America funding in Oregon, and in Central Oregon in particular by the FCC. Transparency of how funds are allocated and spent with results and accountability visible to Americans will be an important part of USF reform.

Please let me know if you have questions or if more information would be helpful. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy Tykeson', followed by a long horizontal flourish line.

Amy Tykeson
President/CEO

Cc: Steven Davis, CenturyLink
Melissa Newman, CenturyLink
Susan Reed, CenturyLink

Attachments:

BBB Wireless Broadband Coverage.pdf (Map)
BendBroadband Detailed 1010 Census Information.pdf